

# FILE COPY

July 15, 1987

TO: File

FROM: Lynn Kunzler, Reclamation Biologist *LK*

RE: Review of Draft Response to the Division's March 30, 1987 Review Document, Topaz Mining Properties, Brush Wellman, Inc., ACT/023/003, Juab Co. Utah

Brush Wellman's draft response was reviewed to determine adequacy of the responses to comments under Rule M-3(2)(e), Rule M-3(2)(f) and Rule M-10(12) made in the Division's March 30, 1987 review. Comments specific to each Rule are summarized below.

## Rule M-3(2)(e) - LK

Previous comments requested the applicant to mulch all areas that are seeded and to anchor the mulch by crimping or using polypropylene netting in areas where crimping was not feasible. After the Division's site visit on July 7, 1987, it was determined that the dump slopes where there was considerable rock on the surface will not require mulch since those areas do not show signs of accelerated erosion and that applying and anchoring the mulch would be impractical.

## Rule M-3(2)(f) - LK

The Draft response adequately addresses comments under this section with regards to timing of revegetation activities.

## Rule M-10(12)-LK

The applicant has requested a variance to meeting the revegetation standards of Rule M-10(12) for the tuff- and rhyolite-covered dumps and backfilled pits.

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After reviewing the limited data from test plots at the Topaz Mining Properties, and considering the recent advances in reclamation technology and the potential for advances in the future, the Division does not feel the full variance to Rule M-10(12) as requested is warranted at this time. The Division hereby proposes the following approach to revegetation and success standards:

1. The revegetation plan as proposed will be used for bonding and for revegetation in the near future.
2. Sites that are revegetated will be monitored for successful vegetation establishment, as per the seed plan used.
3. The revegetation plan may be altered from time to time for the life of mine (each 4 - 5 years) as monitoring or new technology dictates.
4. Variances to the revegetation success standard of 70% of the cover of surrounding areas and species diversity will only be granted on a site specific basis at the end of the normal 3-year liability period for each reclaimed site, after considering the revegetation effort expended on the site, results of revegetation efforts on similar sites and results of any appropriate test plots.

cc: S. Linner  
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